

- 2 The listings contained in the repeater directory are only those facilities intended for general use. The purpose of the Repeater Directory is a "manual of repeater locations",³ it excludes the many "systems, including repeaters, remote bases, control and link channels (*that*) are in properly coordinated operation on authorized frequencies but are not listed in this directory. This is especially common on the 440 MHz band..⁴
- 3 The procedures proposed by the Federal Communications Commission (the Commission) NPRM in this docket are a minimal requirement of simple notification.

To counter these facts, NOAA reply comments suggest that the expenditure of an additional stamp and envelope to ensure notification of operators of all facilities would "invite confusion". NOAA objects to dealing with a "multiplicity of local coordinators", however, the fact remains that the only source of records of sanctions of coordination reside with local coordinators.

Further, NOAA reply comments suggesting that the ARRL "serve as the single interface between profiler operators and the amateur community"¹ is a clear conflict of interest for the ARRL. The ARRL, which is a non-profit organization serving general amateur interests, would also be required to serve as the representative of individual amateur facilities, many of whom will have conflicting needs. Such a conflict of interest will not be well received by the amateur community. We do not believe that such a procedure is sustainable.

On its face, the NOAA reply comments would appear to be a repudiation of informal commitments to the ARRL to control interference.

Efficient use of Spectrum NOAA claims that both 449 and 915 frequencies are required.¹ We note the record indicates no effort has been made to identify necessary requirements and evaluate a single spectrum efficient system to meet those needs. In today's economic environment, Business and Government must increase productivity while simultaneously reducing consumption of limited resources. When Government is urged to cut spending first, we suggest that the requirements for wind profiler spectrum must be considered in that same light. Careful review of objectives and resource needs must be at the heart of every successful American business. That same criteria is equally applicable to the Government sector. A single, spectrum efficient system that meets real needs is preferred.

³ The ARRL Repeater Directory, 1993-1994 Edition at PG 2

⁴ The ARRL Repeater Directory, 1993-1994 Edition at PG 12

Meteorological Aids NOAA defends the use of meteorological aids in radiolocation spectrum⁵ by equating "turbulent eddies in the atmosphere" (the wind) to an object, about which information is to be determined. The NOAA assertion is not supported by the record or the intentions of the framers of the International Radio Regulations. The linguistic slight of hand serves to underscore the weakness of NOAA's position. "That which we call a rose By any other name would smell as sweet."⁶ Further comment is not required.

Interference Concerns In its reply comments, NOAA cites tests run by ARRL and NOAA's Boulder laboratories.⁷ In response we feel compelled to point out that the tests cited were conducted with portable equipment at low elevation and at ground level. In contrast we note that another brief test was also conducted in Colorado.⁸ This test, which was conducted at high elevations typical of repeaters and remote bases, indicated potential for interference at distances of 50 miles.

Non-licensed devices The NOAA reply comments accurately reflect the state of the Commission's Rules.⁹ However, the NOAA comments did not address the political and social realities involved. When large numbers of the public perceive a right of ownership, an extra-legal situation has been created that, as a practical matter, must be considered, both in this docket and future dockets creating such non-licensed spectrum.

Respectfully Submitted

A handwritten signature in black ink, appearing to read "John White", with a stylized flourish at the end.

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⁵ NOAA Reply Comments at PG 3.

⁶ Shakespeare: Romeo and Juliet II.ii.

⁷ NOAA Reply Comments at PG 6.

⁸ Wit Brown, Dayton Hamvention, 1992

⁹ NOAA Reply Comments at PG 10.

I, John White, the chairman of the Oregon Region Relay Council, certify that I have mailed copies of these comments to the persons listed.

A handwritten signature in black ink, appearing to read "John White", with a long horizontal flourish extending to the right.

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